

# **EXHIBIT A**

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**LIST OF SETTLING DEFENDANTS**

**STANLEY CHAIS DEFENDANTS:**

1. Estate of Stanley Chais
2. Pamela Chais
3. Appleby Productions Ltd.
4. The Appleby Productions Ltd. Defined Contribution Plan
5. The Appleby Productions Ltd. Money Purchase Plan
6. The Appleby Productions Ltd. Profit Sharing Plan,
7. Chais Family Foundation
8. Chais Investments, Ltd.
9. Chais 1991 Family Trust

**CHAIS RELATED DEFENDANTS**

1. The Unicycle Trading Company
2. Unicycle Corp., individually and as the General Partner of The Unicycle Trading Company
3. The Unicycle Corporation Money Purchase Plan
4. Onondaga, Inc., individually and as General Partner of Chais Investments Ltd.
5. The Onondaga, Inc. Money Purchase Plan
6. The Onondaga, Inc. Defined Benefit Pension Plan
7. Chais Management, Inc., individually and as General Partner of Chais Management Ltd.
8. Chais Management Ltd.
9. Chais Venture Holdings
10. Emily Chasalow
11. Mark Chais
12. William Chais
13. Michael Chasalow
14. Miri Chais, referred to in the Trustee's Avoidance Complaint as Mirie Chais<sup>1</sup>
15. Wrenn Chais
16. 1994 Trust For The Children Of Stanley And Pamela Chais
17. 1996 Trust For The Children Of Stanley And Pamela Chais, referred to in the Trustee's Avoidance Complaint as The 1996 Trust For The Children Of Pamela Chais And Stanley Chais
18. BLMIS Account 1C1286, sued in the Trustee's Complaint as The 1999 Trust for the Children of Stanley and Pamela Chais

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<sup>1</sup>Motions and answers filed in Adversary Proceeding No. 09-01172 have indicated corrected names for various defendants. These defendants will be referred to herein by their corrected names.

19. 1999 Trust For The Grandchildren Of Stanley And Pamela Chais
20. Emily Chais 1983 Trust
21. Emily Chais Trust No. 1, referred to in the Trustee's Avoidance Complaint collectively with Emily Chais Trust No. 2 and Emily Chais Trust No. 3 as The Emily Chais Trust
22. Emily Chais Trust No. 2, referred to in the Trustee's Avoidance Complaint collectively with Emily Chais Trust No. 1 and Emily Chais Trust No. 3 as The Emily Chais Trust
23. Emily Chais Trust No. 3, referred to in the Trustee's Avoidance Complaint collectively with Emily Chais Trust No. 1 and Emily Chais Trust No. 2 as The Emily Chais Trust
24. Emily Chais Issue Trust No. 1, referred to in the Trustee's Avoidance Complaint collectively with Emily Chais Issue Trust No. 2 as The Emily Chais Issue Trust
25. Emily Chais Issue Trust No. 2, referred to in the Trustee's Avoidance Complaint collectively with Emily Chais Issue Trust No. 1 as The Emily Chais Issue Trust
26. Mark Hugh Chais Trust No. 1, referred to in the Trustee's Avoidance Complaint collectively with Mark Hugh Chais Trust No. 2 and Mark Hugh Chais Trust No. 3 as The Mark Hugh Chais Trust
27. Mark Hugh Chais Trust No. 2, referred to in the Trustee's Avoidance Complaint collectively with Mark Hugh Chais Trust No. 1 and Mark Hugh Chais Trust No. 3 as The Mark Hugh Chais Trust
28. Mark Hugh Chais Trust No. 3, referred to in the Trustee's Avoidance Complaint collectively with Mark Hugh Chais Trust No. 1 and Mark Hugh Chais Trust No. 2 as The Mark Hugh Chais Trust
29. Mark Hugh Chais Issue Trust No. 1, referred to in the Trustee's Avoidance Complaint collectively with Mark Hugh Chais Issue Trust No. 2 as The Mark Hugh Chais Issue Trust
30. Mark Hugh Chais Issue Trust No. 2, referred to in the Trustee's Avoidance Complaint collectively with Mark Hugh Chais Issue Trust No. 2 as The Mark Hugh Chais Issue Trust
31. Mark Hugh Chais 1983 Trust
32. William Frederick Chais Trust No. 1, referred to in the Trustee's Avoidance Complaint collectively with William Frederick Chais Trust No. 2 and William Frederick Chais Trust No. 3 as The William Frederick Chais Trust
33. William Frederick Chais Trust No. 2, referred to in the Trustee's Avoidance Complaint collectively with William Frederick Chais Trust No. 1 and William Frederick Chais Trust No. 3 as The William Frederick Chais Trust
34. William Frederick Chais Trust No. 3, referred to in the Trustee's Avoidance Complaint collectively with William Frederick Chais Trust No. 1 and William Frederick Chais Trust No. 2 as The William Frederick Chais Trust
35. William F. Chais Issue Trust No. 1, referred to in the Trustee's Avoidance Complaint collectively with William F. Chais Issue Trust No. 2 as The William F. Chais Issue Trust
36. William F. Chais Issue Trust No. 2, referred to in the Trustee's Avoidance Complaint collectively with William F. Chais Issue Trust No. 1 as The William F. Chais Issue Trust

37. William Frederick Chais 1983 Trust
38. William And Wrenn Chais 1994 Family Trust
39. Ari Chais 1999 Trust
40. Ari Chais Transferee Trust No. 1, referred to in the Trustee's Avoidance Complaint as The Ari Chais Transferee #1 Trust
41. Benjamin Paul Chasalow 1999 Trust
42. Benjamin Paul Chasalow Transferee Trust No. 1, referred to in the Trustee's Avoidance Complaint as The Benjamin Paul Chasalow Transferee #1 Trust
43. Chloe Frances Chais 1994 Trust
44. Chloe Frances Chais Transferee Trust No. 1, referred to in the Trustee's Avoidance Complaint as The Chloe Francis Chais Transferee #1 Trust
45. Jonathan Wolf Chais 1996 Trust, referred to in the Trustee's Avoidance Complaint as The Jonathan Wolf Chais Trust
46. Jonathan Chais Transferee Trust No. 1, referred to in the Trustee's Avoidance Complaint as The Jonathan Chais Transferee #1 Trust
47. Justin Robert Chasalow 1999 Trust
48. Justin Robert Chasalow Transferee Trust No. 1, referred to in the Trustee's Avoidance Complaint as The Justin Robert Chasalow Transferee #1 Trust
49. Madeline Celia Chais 1992 Trust
50. Madeline Chais Transferee Trust No. 1, referred to in the Trustee's Avoidance Complaint as The Madeline Chais Transferee #1 Trust
51. Rachel Allison Chasalow 1999 Trust
52. Rachel Allison Chasalow Transferee Trust No. 1, referred to in the Trustee's Avoidance Complaint as The Rachel Allison Chasalow Transferee #1 Trust
53. Tali Chais 1997 Trust
54. Tali Chais Transferee Trust No. 1, referred to in the Trustee's Avoidance Complaint as The Tali Chais Transferee #1 Trust